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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

INDEPENDENT PETROLEUM)
ASSOCIATION OF AMERICA, and)
WESTERN ENERGY ALLIANCE,)
)
Petitioners,)
)
v.)
)
SALLY JEWELL, in her official)
capacity as Secretary of the United States)
Department of the Interior, and BUREAU)
OF LAND MANAGEMENT,)
)
Respondents.)
_____)

Civil Case No. 2:15-CV-00043-SWS
[Lead Case]

[Consolidated with No. 2:15-CV-00041-SWS]

**NOTICE OF WITHDRAWAL OF MOTION AND
INTENT TO FILE OPENING MEMORANDUM ON THE MERITS**

Petitioners Independent Petroleum Association of America and Western Energy Alliance (collectively, “Petitioners”) submit this notice to advise the Court that Petitioners withdraw the motion to complete the administrative record that the Petitioners filed on November 6, 2015. *See*

Mot. to Modify the Admin. R., No. 2:15-CV-00043-SWS, filed Nov. 6, 2015 (ECF No. 137).

On January 19, 2016, BLM lodged an amended administrative record with the Court. *See* Fed. Resp'ts' Notice of Lodging of Corrected Admin. R., No. 2:15-CV-00043-SWS, filed Jan. 19, 2016 (ECF No. 184). Under this Court's local rules, the filing of the administrative record triggers additional deadlines: (i) motions to supplement the record or add extra-record evidence are due fourteen days from the filing of the administrative record, *see* U.S.D.C.L.R. 83.6(b)(3); and (ii) absent proceedings related to the content of the administrative record, Petitioners' opening merits briefs are due forty-five days after the administrative record is filed. If there is a motion filed under U.S.D.C.L.R. 83.6(b)(3) – as there was in this case – Petitioners “must serve and file a brief within forty-five (45) days after the date either (1) an amended record is filed; or (2) the motion is denied.” U.S.D.C.L.R. 83.6(c). Consistent with the Court's local rules, Petitioners therefore intend to file their opening memorandum in support of this administrative appeal no later than March 4, 2016.

Submitted respectfully this 9th day of February, 2016,

/s/ Mark S. Barron
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CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of February, 2016, a copy of the foregoing **NOTICE OF WITHDRAWAL OF MOTION AND INTENT TO FILE OPENING MEMORANDUM ON THE MERITS** was electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Susan Quinn

Susan Quinn